

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MARILYN LUCEY,

Plaintiff,

v.

HARTFORD LIFE and ACCIDENT INSURANCE COMPANY,

Defendant.

04-CV-10800-NG

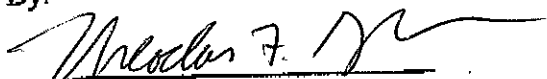
JOINT MOTION TO PLACE EXHIBITS FROM PRIOR MOTIONS UNDER SEAL

**NOW COME THE PARTIES** in the above entitled matter, and hereby jointly move the Court to place under seal the following documents:

1. All exhibits to Plaintiff's Motion to Define the Proper Scope of the Record for Judicial Review ("Plaintiff's Motion"); and,
2. All exhibits to Defendant Hartford Life & Accident Insurance Company's Opposition to Plaintiff's Motion to Define the Proper Scope of the Record for Judicial Review ("Hartford's Opposition").

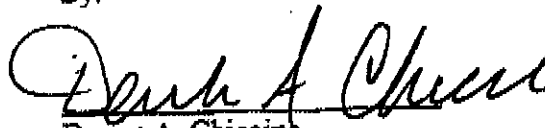
As grounds for the motion, the Parties state the Court has previously allowed the Parties Joint Motion to Seal the Record for Judicial Review. Therefore, sealing these additional documents would be consistent with the Court's prior practice in the case, and may alleviate any confusion the Court might have as to which documents are under seal. For all of these reasons, the Parties respectfully request that the Court place under seal all exhibits to Plaintiff's Motion, as well as all exhibits to Hartford's Opposition.

Respectfully Submitted, Defendant  
Hartford Life and Accident Insurance  
Company,  
By:



Theodore Glockner  
BBO No. 629469  
CREVIER & RYAN, LLP.  
1500 Main Street, Suite 2200  
Springfield, MA 01115-5532  
(413) 787-2400

Respectfully Submitted,  
Plaintiff, Marilyn Lucey  
By:



Denise A. Chicoine  
BBO No. 564152  
ENGLANDER & CHICOINE  
2 Newton Place, Suite 200  
Newton, MA 02458-1633  
Tel: (617) 964-5400